

LAW OFFICE OF MICHAEL L. FERCH  
280 MADISON AVENUE, SUITE 912  
NEW YORK, NY 10016BROOKLYN OFFICE:  
71 OCEAN PARKWAY, SUITE 3N  
BROOKLYN, NY 11218PHONE (212) 757-2520  
FAX (718) 972-4505  
MICHAEL@FERCHLAW.COM

September 25, 2020

**BY ECF AND EMAIL**

Honorable Andrew L. Carter, Jr.  
United States District Court for the  
Southern District of New York  
40 Foley Square, Room 435  
New York, New York 10007  
ALCarterNYSDChambers@nysd.uscourts.gov

Re: Samiha Alayan and Zeyad Barazangi v. Permanent  
Mission of the Kingdom of Saudi Arabia to the  
United Nations; Case No.: 18-cv-10068 (ALC):  
Request for Extension of Time

Dear Judge Carter:

I represent Plaintiffs Samiha Alayan and Zeyad Barazangi ("Plaintiffs") in the above-referenced matter. With Defendant's consent, Plaintiffs respectfully request an extension of the current October 1, 2020, deadline to respond to Defendant's Motion to Dismiss the Complaint for *Forum Non Conveniens* and For Lack of Jurisdiction Under the Foreign Sovereign Immunities Act (Dkt. #23). This is Plaintiffs' first request for an extension.

Plaintiffs' new deadline would be extended to and including Thursday, October 22, 2020. As a matter of courtesy, Plaintiffs have offered Defendant an extension of the reply period. Accordingly, Defendant respectfully seeks a two (2) week extension of the two (2) week reply period provided for in the Court's Order of August 7, 2020 (Dkt. #21). Defendant's current deadline of Thursday, October

Hon. Andrew L. Carter, Jr.  
September 25, 2020  
Page 2

15, 2020, therefore would be extended to Thursday, November 19, 2020. Of course, Plaintiffs consent.

The proposed new deadlines will not conflict with any scheduled date in this case, and will not prejudice any party.

There is good cause for this request because, in addition to now-conflicting court deadlines in other litigation matters, the Covid global health crisis recently has had an unexpected and significant effect on my law practice. My wife is a First Responder and therefore considered "essential personnel." Unfortunately, this has made for unforeseen challenges to our family, and particularly for our children.

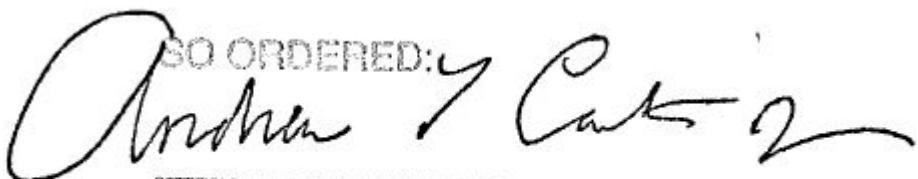
Thank you for your time and attention to this matter.

Respectfully Submitted,



Michael L. Ferch, Esq.

cc: Alexandra E. Chopin, Esq. (counsel for Defendant)  
Mitchell R. Berger, Esq. (counsel for Defendant)

  
SO ORDERED:  
Andrew L. Carter, Jr.  
HON. ANDREW L. CARTER, JR.  
UNITED STATES DISTRICT JUDGE

10/1/20